

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

NORTHWEST SCHOOL OF SAFETY, a Washington sole proprietorship, PUGET SOUND SECURITY, INC., a Washington corporation, PACIFIC NORTHWEST ASSOCIATION OF INVESTIGATORS, INC., a Washington corporation, FIREARMS ACADEMY OF SEATTLE, INC., a Washington corporation, DARRYL LEE, XEE DEL REAL, JOE WALDRON, GENE HOFFMAN, ANDREW GOTTLIEB, ALAN GOTTLIEB, GOTTLIEB FAMILY REVOCABLE LIVING TRUST, A Washington trust, and SECOND AMENDMENT FOUNDATION, a non-profit organization.

Plaintiffs.

BOB FERGUSON, Attorney General of Washington (in his official capacity),
WASHINGTON ATTORNEY GENERAL'S OFFICE, and JOHN R. BATISTE, Chief of the Washington State Patrol (in his official capacity), and DOES I-V

Defendants.

and

CHERYL STUMBO, WASHINGTON
ALLIANCE FOR GUN
RESPONSIBILITY AND
EVERYTOWN FOR GUN SAFETY
ACTION FUND FOR I-594.

Intervenor-Defendants

**STIPULATED MOTION FOR ENTRY OF
AGREEMENT REGARDING
DISCOVERY OF ELECTRONICALLY
STORED INFORMATION**

NO. 3:14-cv-6026 BHS

**STIPULATED MOTION FOR
ENTRY OF AGREEMENT
REGARDING DISCOVERY OF
ELECTRONICALLY STORED
INFORMATION**

Note on Motion Calendar: April 29, 2015

1 All parties to this action have entered into the attached stipulation for an order
2 regarding the discovery of electronically stored information (“ESI”) and disclosure of
3 privileged information in this matter. Defendants accordingly move this Court for entry of
4 the attached stipulated order.

5 DATED this 29th day of April 2015.

6 ROBERT W. FERGUSON
7 *Attorney General*

8 s/Jeffrey T. Even
9 NOAH G. PURCELL, WSBA # 43492
10 *Solicitor General*
11 JEFFREY T. EVEN, WSBA # 20367
12 REBECCA R. GLASGOW, WSBA # 32886
13 *Deputy Solicitors General*
14 R. JULY SIMPSON, WSBA # 45869
15 *Assistant Attorney General*

16 Attorneys For Defendants Bob Ferguson,
17 Attorney General Of Washington, Washington
18 Attorney General's Office, and John R. Batiste,
19 Chief Of The Washington State Patrol

Certificate of Service

I certify, under penalty of perjury under the laws of the state of Washington, that I electronically filed a true and correct copy of the foregoing document with the United States District Court ECF system, which will send notification of the filing to the following:

<p>David B. Edwards Steven W. Fogg Corr Cronin Michelson Baumgardner & Preece 1001 4th Avenue, Suite 3900 Seattle, WA 98154-1051 Phone: 206.625.8600 dedwards@corrchronin.com sfogg@corrchronin.com</p>	<p>Mikolaj T. Tempski Tempski Law Firm PS 40 Lake Bellevue, Suite 100 Bellevue, WA 98005 Phone: 425.998.6203 Email: Miko@TempskiLaw.com</p>
<p>Gregory J. Wong Paul J. Lawrence Sarah S. Washburn Pacifica LAw Group, LLP 1191 Second Avenue, Suite 2000 Seattle Washington 98101-3404 paul.lawrence@pacificalawgroup.com greg.wong@pacificalawgroup.com sarah.washburn@pacificalawgroup.com</p>	

DATED this 29th day of April 2015, at Olympia, Washington.

s/ Stephanie N. Lindey
STEPHANIE N. LINDEY
Legal Secretary